

Continuation of Criminal Complaint

I, Nicholas Mascorro, being duly sworn, hereby depose and state as follows:

Introduction and Background

1. I am a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), and I have served as such since March 2016. I am a graduate of the Special Agent Basic Training Program at the ATF National Academy and of the Criminal Investigator Training Program at the Federal Law Enforcement Training Center. I have conducted numerous investigations into the unlawful possession and use of firearms, the possession and distribution of controlled substances, and conspiracies associated with firearm and narcotic offenses. I am presently assigned to ATF's Lansing Office. As a Special Agent with ATF, my primary duties include the investigation of alleged violations of federal firearm laws, including the subject offense of 18 U.S.C. § 922(g)(1) (felon in possession of a firearm).

2. I submit this continuation in support of a criminal complaint and arrest warrant for Tom Manuel. As set forth below, there is probable cause to believe that Manuel committed a violation of 18 U.S.C § 922(g)(1) (felon in possession of a firearm) on October 27, 2023, in Ingham County.

3. The information contained in this continuation is based on information obtained in part on: (a) my personal participation in this investigation; (b) information provided by other law enforcement officers; (c) criminal history records; and (d) my personal training and experience and the training and experience of other law enforcement personnel. This continuation does not contain all the information known because of this investigation, but only those facts that I believe are necessary

to establish probable cause to show that Tom Manuel committed a violation of 18 U.S.C § 922(g)(1) (felon in possession of a firearm) on October 27, 2023.

4. ATF and the Lansing Police Department are currently conducting a joint investigation of Tom Manuel for violation of 18 U.S.C. § 922 (g)(1) (felon in possession of firearm).

5. I located the following felony conviction for Manuel:

- a. 1998 – Felony Armed Robbery;
- b. 1998 – Felony Weapons Felony Firearm and
- c. 2010 – Felon in Possession of a Firearm.

6. On October 27, 2023, LPD Officer James Zolnai was conducting surveillance on Manuel's address of 4219 Burchfield Drive, Lansing, Michigan. Manuel had an active arrest warrant for a criminal bench for contempt of court. During this surveillance Officer Zolnai observed Manuel walk within approximately 5 feet of Officer Zolnai's vehicle. At this time Officer Zolnai positively identified the person to be Manuel and observed a bulge at Manuel's waistline, consistent with how an individual would carry a firearm. Michigan State Police Trooper Calvin Harshman attempted to make contact with Manuel, at which time Manuel began to flee from law enforcement, however. Officer Zolnai and Trooper Harshman pursued Manuel and took him into custody in the area of Lowcroft Avenue and West Mason Street, Lansing, Ingham County, Michigan.

7. During the search of Manuel's person at the time of arrest the following were located:

- a. A black Ruger .22 caliber revolver containing two rounds of CCI .22 caliber ammunition, located within a holster within Manuel's waistband;
- b. A digital scale located in Manuel's pocket;
- c. An empty plastic baggie located within Manuel's pocket;
- d. Less than a gram of cocaine base (field tested positive) located in Manuel's pocket;
- e. \$193.00 in mixed denominations located within Manuel's pocket and
- f. One silver Maxwest cell phone located in Manuel's pocket.

In my training and experience, these items are consistent with someone engaged in drug trafficking.

8. Upon further search of Manuel at the LPD Jail, Trooper Harshman also located .4 grams of methamphetamine (field tested positive) in Manuel's pocket.

9. On November 3, 2023, I was advised by ATF Interstate Nexus Expert Timothy Hunt, Ruger firearms and CCI ammunition, are not manufactured in the State of Michigan.

Conclusion

10. Based on the forgoing facts, I submit there is probable cause to believe that Tom MANUEL has knowingly possessed a firearm after previously being convicted of a felony, in violation of 18 U.S.C. § 922(g)(1) (felon in possession of a firearm). I respectfully request that the Court issue a criminal complaint for Manuel charging him with this offense.